



The Hon. Sylvia O. Hinds-Radix
Corporation Counsel

THE CITY OF NEW YORK
LAW
DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Martha Nimmer
Special Assistant Corporation Counsel
Cell: (917) 499-8632

MEMO ENDORSED

October 6, 2023

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

The pretrial conference is rescheduled to December 5, 2023 at 3:30 PM. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: October 6, 2023

New York, New York

Re: *T.R. v. N.Y.C. Dep't of Education*, 22-cv-6373 (ER)(GWG)

Dear Judge Ramos:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks implementation as well as attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

The parties write jointly to respectfully request a 6-week adjournment of the pre-trial conference, from October 10, 2023 to November 21, 2023. This is the third request to adjourn the initial conference. The first request was made on June 1, 2023 and granted by Your Honor the following day. The second request was made on August 1, 2023 and granted by Your Honor on August 3, 2023. The requested extension will give the parties additional time to resolve implementation and then begin settlement discussions. The parties are hopeful that they can settle this matter without further burden on the Court's time.

Accordingly, the parties request that the initial conference be adjourned to November 21, 2023.

Thank you for considering this request.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Erin Murray, Esq. (via ECF)